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LETTER AND RESPONSE TO REGULATOR COMMENTS ON UFP SAMPLING AND ANALYSIS PLAN PHASE I RCRA FACILITY INVESTIGATION SOLID WASTE MANAGEMENT UNIT 21 (SWMU 21) FORMER DRMO STORAGE LOT NSA CRANE IN
3/23/2010
TETRA TECH

Response-to-Comments (RTC) Document
On
Uniform Federal Policy-Sampling and Analysis Plan (UFP-SAP) for
Phase I RFI at SWMU 21 – Former DRMO Storage Lot at NSA Crane

Comments Received from US Navy on February 24, 2010
On Internal Draft version issued on November 6, 2009

RTC Prepared by Tetra Tech NUS, Inc.
Date Issued: March 23, 2010

1. Worksheet 10, Section 10.1, Paragraph 4.
Comment: Buildings 1940, 2918 and 2705 were demolished in 2009.

Response: Text was revised as follows to report that the subject buildings have been removed:

Physical structures at the site (as of June 2009) are shown on Figure 10-3. The site contains two processing buildings (3248 and 3249), an office and restroom building (2703), an abandoned paper baler building (2704), two truck/railroad scales and a scale house (2943), an inactive oil/water separator (OWS) (3058), a paved storage yard northwest of the OWS, and a paved storage area in the southwestern corner of the site. A leach field is located on a portion of the hillside that forms the western boundary of the site. The two metals balers (2918 and 2705) as well as a second scale house (1940) shown on Figure 10-3 were demolished and removed from the site in 2009.

The Executive Summary was also revised as follows:

Current physical structures at the site include two processing buildings, an office and restroom building, abandoned paper baler building, two truck/railroad scales and one scale house, an inactive oil/water separator (OWS), and paved and unpaved storage areas. Formerly, separated water from the inactive OWS was discharged into Haynes Branch, a creek located immediately east of SWMU 21. The OWS is no longer functional. Two inactive metals balers and a second scale house were demolished and removed from the site in 2009.

2. Worksheet 10, Section 10.1, Paragraph 10.
Comment: Please check/verify location of nearest resident.

Response: Text was revised as follows:

The site is near the center of NSA Crane. The nearest off-site residence is approximately 4 miles west of the site.

3. Worksheet 11, Section 11.2, Initial Paragraph and Item 1.
Comment: Clarify what constitutes surface soils (i.e., 0-2 feet below the gravel layer), as well as what percentage of gravel is acceptable. This should also go into the field SOP.

Response: Text was revised in Worksheet No. 14 under the discussion of Surface and Subsurface Soil Sampling as follows:

Surface soils at NSA Crane are identified as the top two feet of soil (from 0 to 2 feet bgs). Surface soil does not include surface pavement and the ground surface will begin at the bottom of a pavement or gravel layer. At the gravel layer area of the DRMO Storage Lot site, the surface soil of interest consists of the native soil immediately below the imported gravel

that has been placed on top of the soil to make the surface usable for its intended purpose. Due to an unknown and expected to be variable depth of gravel, the top of the surface soil boundary will be determined in the field on a location-specific basis. "Ground" will begin where more than two-thirds of the material is soil or small particle material, based on a visual assessment by the sampler. This depth will be recorded by the sampler in the logbook. Surface soil is expected to begin approximately 6" to 18" below the top (surface) of the pavement or gravel layer at the DRMO Storage Lot, and extend 2 feet below that depth. If an HHRA or an ERA is deemed necessary, the Risk Assessment Report will discuss how these particular samples were addressed in the assessment(s) with regard to potential exposure and actual risk.

4. Worksheet 11, Section 11.4, Phase I, Paragraph 3.
Comment: Rewrite paragraph to make it more understandable.

Response: Text was revised as follows:

If any analyte is detected in site media at a maximum concentration that exceeds a risk-based screening value and is greater than the site-specific background concentration (for metals), then the Project Team will meet to discuss a path forward. The Project Team will review the data to determine the tasks that must be performed during Phase II to complete delineation of the nature and extent of contamination and to determine if a there is a need to conduct a human health and/or ecological risk assessment. The Project Team will review the analytes that exceed the risk-based screening values based on specific factors that include the following:....

5. Worksheet 11, Section 11.4, Phase II, Risk Assessment, Paragraph 2.
Comment: Should this be "upgradient"?

Response: Text was revised to:

Water samples, because of mixing during movement, are expected to represent the area in which they are collected and areas upgradient of the sample location.

6. Worksheet 11, Section 11.4, Phase II, Risk Assessment, Decision Rules 1 and 2.
Comment: Would it be better to define them (EU – Exposure Unit) in the risk assessment report rather than via a SAP addendum?

Response: If contamination is found that requires additional investigation, it will be appropriate to define the EUs in a UFP-SAP Addendum before the sampling is performed and before a risk assessment is conducted.

7. Worksheet 14, Section 14.1, Surface and Subsurface Soil Sampling.
Comment: Add a reference to SOP 11 (Subsurface Soil Sampling Using DPT).

Response: A reference to SOP-11 was added to the text. Also, a paragraph was added to explain how surface and subsurface soil will be determined.

8. Worksheet 14, Section 14.1, Surface and Subsurface Soil Sampling
Comment: A DPT rig with augering capability is probably ideal, especially for the number of samples proposed at this site.

Response: It is anticipated that a DPT rig with auger capability will be used to collect the samples. However, a backhoe and/or hand auger may also be used to collect the samples, due to variable site conditions.

9. Worksheet 14, Section 14.1, Groundwater Well Installation and Development.
Comment: Add a reference to SOP 11 (Subsurface Soil Sampling Using DPT).

Response: A reference to SOP-11 was added to the text.

10. Worksheet 14, Section 14.1, Groundwater Well Installation and Development and Groundwater Sampling.
Comment: Should these two sections be deferred to the Phase II Addendum?

Response: This Phase I SAP describes the basis and preliminary design for Phase II. The two sections will be expanded upon in the Phase II Addendum, if such an action is deemed necessary based on the results of Phase I.

11. Worksheet 14, Section 14.2, Analytical Tasks.
Comment: Be sure to include CompuChem's NELAP Certification and recent PE results.

Response: CompuChem has currently been audited and initiated corrective action for their Department of Defense Environmental Laboratory Accreditation Program (DoD ELAP) Certification, but is still waiting their accreditation letter, which will be provided as soon as it is available. The NELAP Certification and PE results have been added to Appendix B.

12. Worksheet 15—all Sections.
Comment: This is an example of a multi-page tabular worksheet that needs to have the WS number in either the heading or footer.

Response: The footer of each worksheet was revised to include the corresponding WS number.

13. Worksheet 17, Soil Sampling (Phase I and Phase II), IA 4 – Original Metals Baler
Comment: B2704 was the old paper baler. Please double-check the source of this information.

Response: The Original Metals Baler (Former Building 1944) was described as being located north of current structure 2704 (Old Paper Baler) prior to its removal in 1951/1952, as stated in WS 10.2, paragraph 3. A copy of drawings showing Building 1944 are attached to this RTC document.

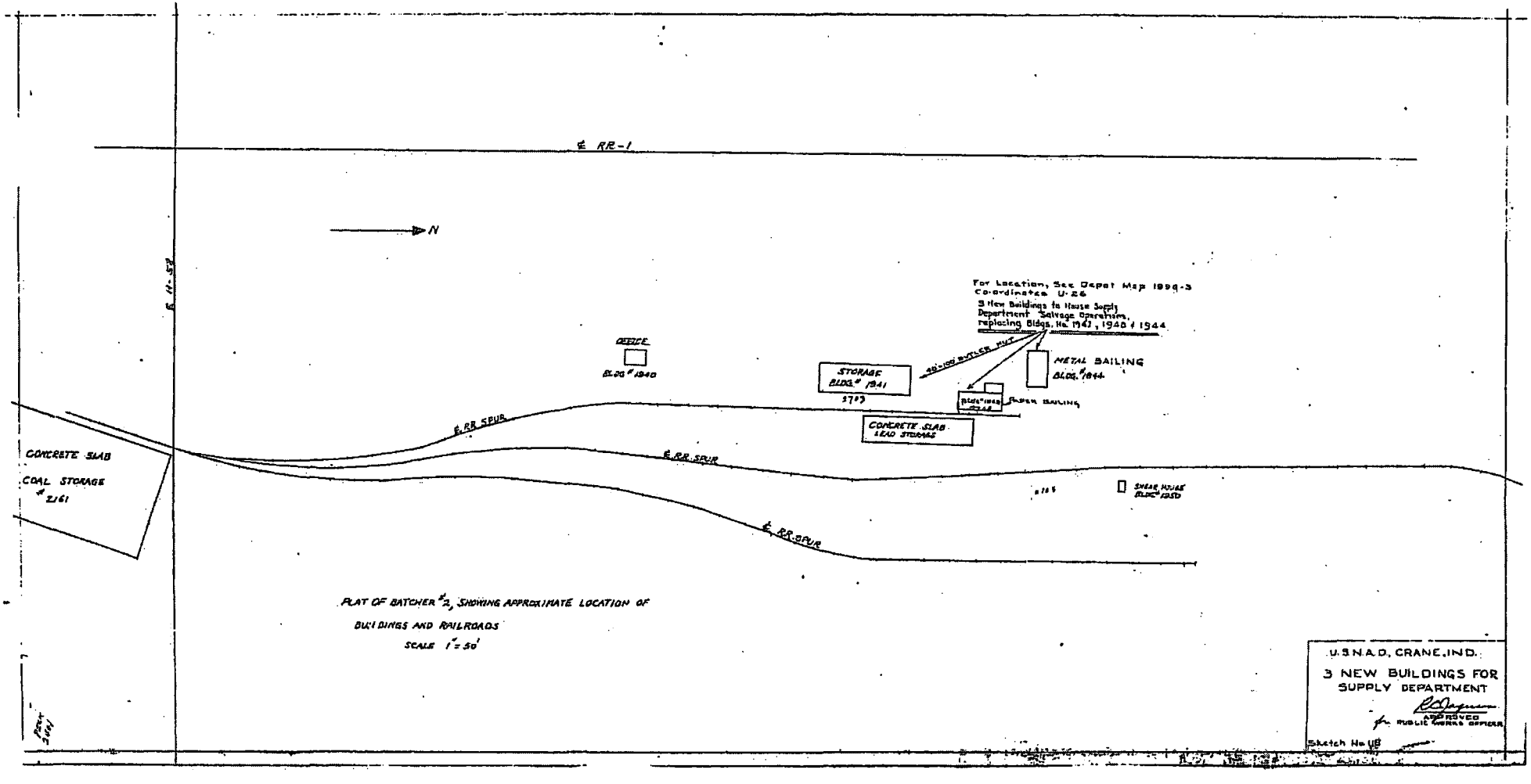
14. Worksheet 17, Soil Sampling (Phase I and Phase II), IA 6 – Open Grass Area
Comment: There are actually 2 culverts. The northern culvert is located near IA601 on Figure 17-2.

Response: Soil samples for IA 6 will include samples from the outlet area of each of the two culverts to Haynes Branch. The text has been revised as follows:

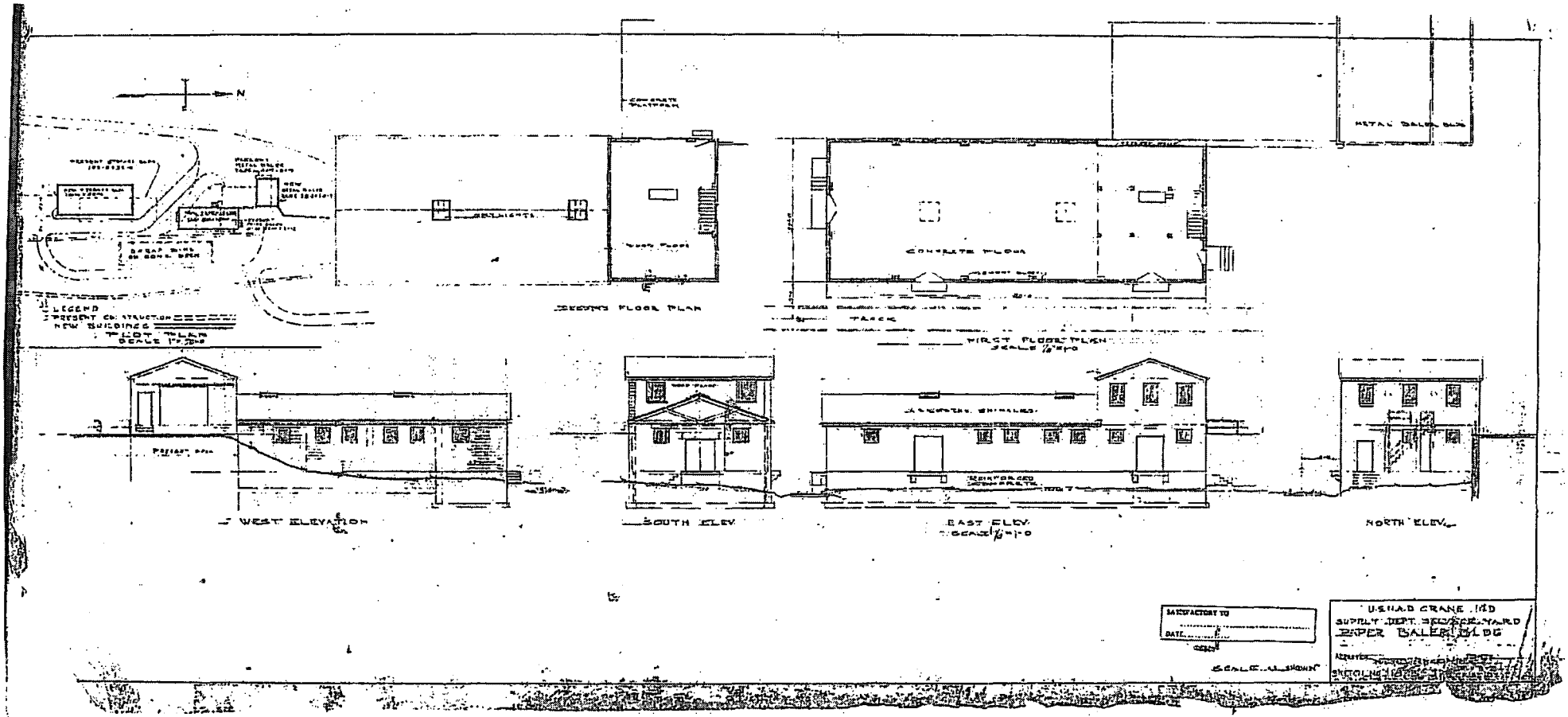
Based on the CSM, six surface soil samples will be collected from IA 6 at approximately 200-foot intervals. This will include surface soil samples at the outlet areas of the two culverts to Haynes Branch.

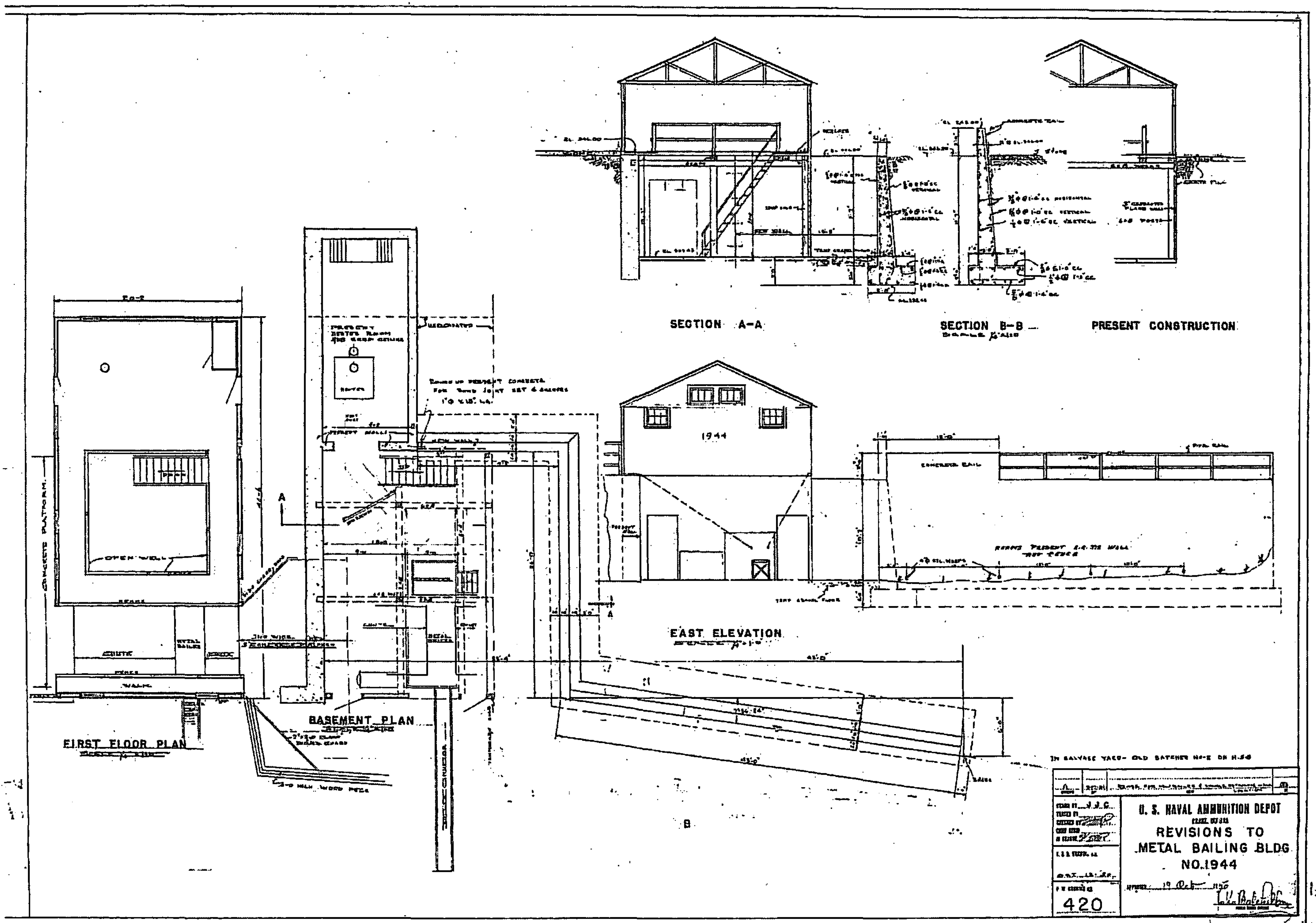
15. Worksheet 17, Background Soil Samples
Comment: Crane has relied quite heavily on the basewide background soils study. As such, there's some concern that determining the need for additional background samples could have the effect of invalidating the results of the Basewide Background Report.

Response: This paragraph has been deleted. The Final Base-Wide Background Soil Investigation Report for Naval Surface Warfare Center Crane (Tetra Tech, 2001) will be used as the basis for determining background concentrations of inorganics.


℄ RR-1
N
℄ 11-ST
For Location, See Depot Map 1994-3
Co-ordinates U-26
3 New Buildings to House Supply
Department Salvage Operations,
replacing Bldgs. No. 1941, 1948 & 1944
OFFICE
BLDG.# 1940
STORAGE
BLDG.# 1941
1949
40'-100' BUTLER HUT
METAL BAILING
BLDG.# 1944
Bldg.# 1948
PAPER BAILING
CONCRETE SLAB
LEAD STORAGE
℄ RR SPUR
℄ RR SPUR
℄ RR SPUR
CONCRETE SLAB
COAL STORAGE
2161
SHEAR HOUSE
BLDG.# 1050
PLAT OF BATCHER #2, SHOWING APPROXIMATE LOCATION OF
BUILDINGS AND RAILROADS
SCALE 1" = 50'
U.S.N.A.D., CRANE, IND.
3 NEW BUILDINGS FOR
SUPPLY DEPARTMENT
APPROVED
for PUBLIC WORKS OFFICER
Sketch No. 18

RMB686


N
LEGEND
PRESENT CONSTRUCTION
NEW BUILDINGS
PLOT PLAN
SCALE 1"=20'
CONCRETE FLOOR
TRACK
FIRST FLOOR PLAN
SCALE 1/8"=1'0
WEST ELEVATION
SOUTH ELEV
EAST ELEV
SCALE 1/8"=1'0
NORTH ELEV
SATISFACTORY TO
DATE
SCALE AS SHOWN
U.S.N.A.D. CRANE, IND.
SUPPLY DEPT. PROJECT YARD
PAPER BALER BLDG


SECTION A-A
SECTION B-B
PRESENT CONSTRUCTION
1944
EAST ELEVATION
CONCRETE PLATFORM
OPEN WELL
FIRST FLOOR PLAN
BASEMENT PLAN
A
B
U. S. NAVAL AMMUNITION DEPOT
REVISIONS TO
METAL BAILING BLDG
NO.1944
420